

**UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS**

SINGULAR COMPUTING LLC,

Plaintiff,

v.

GOOGLE LLC,

Defendant.

Civil Action No. 1:19-cv-12551-FDS

Hon. F. Dennis Saylor IV

**DECLARATION OF KEVIN GANNON IN SUPPORT OF PLAINTIFF'S  
MOTION TO COMPEL DEPOSITION AND DOCUMENT DISCOVERY**

I, Kevin Gannon, hereby declare as follows:

1. I am an attorney with the law firm Prince Lobel Tye LLP, attorneys for plaintiff, Singular Computing LLC ("Singular"), in this action. I submit this declaration in support of Singular's Motion to Compel Deposition and Document Discovery.
2. Attached hereto as Exhibit A is a true and correct copy of a letter from Christopher Sun to Kerry Timbers dated July 27, 2023.
3. Attached hereto as Exhibit B is a true and correct copy of Singular's First Set of Requests for Production to Google dated July 10, 2020.
4. Attached hereto as Exhibit C is a true and correct copy of GOOG-SING-00242338-43.
5. Attached hereto as Exhibit D is a true and correct copy of GOOG-SING-00242326-37
6. Attached hereto as Exhibit E is a true and correct copy of GOOG-SING-00242320-25.

7. Attached hereto as Exhibit F is a true and correct copy of GOOG-SING-00242356-62.

8. Attached hereto as Exhibit G is a true and correct copy of relevant pages from Google's Sixth Supplemental Responses and Objections to Plaintiff's First Set of Interrogatories (Nos. 1-10).

9. Attached hereto as Exhibit H is a true and correct copy of excerpts from the Deposition of Andrew Phelps taken July 14, 2021.

10. Attached hereto as Exhibit I is a true and correct copy of an email from Obi Felton to Joseph Bates dated February 20, 2017.

11. Attached hereto as Exhibit J is a true and correct copy of excerpts from the Deposition of James Laudon taken July 15, 2021.

12. Attached hereto as Exhibit K is a true and correct copy of excerpts from the Status Conference held on July 18, 2023.

13. Attached hereto as Exhibit L is a true and correct copy of GOOG-SING-00242381-435.

14. Attached hereto as Exhibit M is a true and correct copy of an email from Kerry Timbers to Christopher Sun dated July 24, 2023.

15. Attached hereto as Exhibit N is a true and correct copy of a letter from Jay Rapaport to Michael Ercolini dated January 11, 2021.

16. Attached hereto as Exhibit O is a true and correct copy of Singular's First Request for Email Productions dated October 20, 2020.

17. Attached hereto as Exhibit P is a true and correct copy of a letter from Matthias Kamber to Michael Ercolini dated November 11, 2020.

Executed at Boston, Massachusetts on July 31, 2023.

/s/ Kevin Gannon